

## **INFORMATION QUALITY GUIDELINES UNDER SECTION 515 OF P.L. 106-554**

### Background

The Office of the Inspector General (OIG) is a statutorily independent component of the Farm Credit Administration (FCA), in accordance with the Inspector General Act, 5 U.S.C. App. 3. The primary responsibilities of the OIG involve reviewing, auditing, investigating, and reporting waste, fraud and abuse in the FCA's programs and operations.

OIG is excluded from FCA's Information Quality Guidelines so that the independence of the OIG will not be compromised by having another office in the FCA review the methodology and preparation of OIG's work. OIG's adoption of separate guidance allows requests for corrections or alterations to OIG reports to be handled within the OIG thereby eliminating any conflict with the statutory provision that the Inspector General shall be under the "general supervision" of the agency head ... "but shall not report to, or be subject to supervision by, any other officer of such establishment." Inspector General Act, Section 3(a).

The OIG information quality guidelines, like FCA's guidelines, provide assurances and procedures to public. OIG's guidelines apply to OIG audit, inspection, and reviews undertaken by the OIG's Office that are posted on the OIG's web site. The guidelines will not apply to reports of investigation of employee misconduct or illegal activity that are submitted to Federal or State prosecutors for purposes of criminal prosecution or to FCA for purposes of administrative discipline. Nor will they apply to confidential board advisories, legal advice, or management advisories.

The guidelines are intended to ensure accuracy in OIG reports disseminated to the public. The steps described below reflect the OIG normal practice and may vary to some degree from one review to another. This description does not confer any rights upon a subject or witness of an OIG investigation to a pre-issuance review, which is reserved to the Inspector General's discretion and judgment. The remedies provided in these guidelines are limited to that which is set forth below.

## OIG QUALITY GUIDELINES

### OVERSIGHT MANAGEMENT RESPONSIBILITY

The Counsel to the Inspector General shall be responsible for overall implementation and oversight of information quality guidelines for the OIG. The Counsel will be responsible for receiving and responding to requests for corrections and for producing the annual report to OMB regarding complaints and how they were addressed. The IG will be responsible for considering and responding to requests for reconsideration of requests for corrections.

### STANDARDS FOR DISSEMINATED INFORMATION

The OIG has adopted standards of quality that assure utility, objectivity, and integrity. In addition, statistical information disseminated by the OIG is based on sound statistical methods and the principle of transparency. Finally, influential information is subject to an added level of scrutiny.

For purposes of these guidelines, the following definitions apply:

Utility means that the information to be disseminated is useful to its intended users including the public.

Objectivity means that disseminated information is substantively accurate, clear, complete, and presented in an unbiased manner.

Integrity means that information is protected from unauthorized access, corruption, or revision to ensure that disseminated information is not compromised through corruption or falsification.

Sound statistical methods means that methods are used to produce information that is accurate, reliable, and unbiased.

Transparency refers to a clear description of the methods, data sources, assumptions, outcomes, and related information that will allow the data user to understand how the information produced was designed or produced.

Influential information means information that is expected to have a clear and substantial impact at the national level on major public or private policy decisions.

## APPLICATION OF STANDARDS OF QUALITY BY THE OIG

### OIG Audits

Audits are performed in accordance with the Government Auditing Standards, issued by the Comptroller General of the United States (the Yellow Book), and OIG policies. The Yellow Book prescribes generally accepted government auditing standards and the IG policies provide a roadmap to be followed for audits including the supervisory review of audit working papers and reports and referencing. In addition to these standards, each internal audit report is provided in draft to the FCA office or division that was the subject of the audit for review and comment prior to final dissemination. The audited entity's comments are published in the final report.

Prior to posting on the OIG website, the audit report is reviewed by the Counsel to the IG to assure compliance with the Privacy Act, Trade Secrets Act and to identify any material that falls within a Freedom of Information Act exemption.

## EVALUATION, SURVEY AND INSPECTION REPORTS

Like audit reports, OIG evaluations, surveys, and inspections follow guidelines to ensure that the information in these reports is objective, useful, and based on sound evaluation principles, including the proper use of statistical methods.

The Quality Standards for Inspections, promulgated by the President's Council on Integrity and Efficiency, issued in March 1993, are used as guidance for writing inspection reports. There are 12 major standards for ensuring quality work: Qualifications, Independence, Due Professional Care, Quality Control, Planning, Data Collection and Analysis, Evidence, Supporting Documentation, Timeliness, Fraud and Other Illegal Acts, Reporting, and Follow-up.

In addition to these standards, each report undergoes extensive review within OIG. A draft of the report is provided to the office or division that is the subject of the review for comment prior to final publication.

Prior to posting on the OIG website, the report is reviewed by the Counsel to the IG to ensure compliance with the Privacy Act and the Trade Secrets Act, and to identify any material that falls within an exemption to the Freedom of Information Act.

## INFORMATION CORRECTION REQUEST AND APPEAL PROCESS

Submitting a Formal Request for Correction. All requests for correction of OIG information must be submitted by letter, fax, or e-mail to the Counsel to the IG. Requests for correction should include the following information:

- A statement that the request for correction of information is submitted under the OIG's Information Quality Guidelines.
- Requestor contact information, including the name, mailing address, telephone number, fax number (if any), e-mail address (if any), and organizational affiliation (if any) of the person requesting the correction.
- Description of information to be corrected, including the name of the OIG report or data product, the date of issuance or other identifying information such as the URL of the web pages, and a detailed description that clearly identifies the specific information contained in that report or data product for which a correction is being sought.
- Explanation of noncompliance with OMB and/or OIG Information Quality Guidelines. This should include an explanation that describes how information fails to meet either the OMB or OIG Information Quality Guidelines.
- Explanation of the effect of the alleged error. An explanation that describes how the alleged error harms the requestor or how a correction would benefit the requestor.

- Recommendation and justification for how the information should be corrected. An explanation that gives the requestor's specific recommendations for how the information should be corrected and that describes the requestor's position as to why the OIG should adopt those recommendations.
- Supporting documentary evidence, such as comparable data or research results on the same topic, which will help in evaluating the merits of the request.

Requestors should be aware that they bear the "burden of proof" with respect to the necessity for correction as well as with respect to the type of correction they seek. The OIG will base its decision on the merits of the information provided by the requestor and will not attempt to contact the requestor to obtain additional information when the submission by the requestor is incomplete.

#### OIG REVIEW OF THE REQUEST FOR CORRECTION

The request for correction will be processed by the Counsel to the Inspector General. Based on the explanation and evidence submitted with the request for correction, Counsel will involve the appropriate OIG staff members. After review of the information being challenged, the processes that were used to create and disseminate the information, and the conformity of the information and those processes with both OMB's and OIG's Information Quality Guidelines, a determination will be made whether a correction is warranted, and, if so, what corrective action it will take.

Corrective action will be determined by the nature and timeliness of the information involved and such factors as the significance of the error on the use of the information, the magnitude of the error, and the cost of undertaking a correction. The OIG is not required to change, or in any way alter, the content or status of information based only on the receipt of a request for correction.

The OIG need not respond substantively to frivolous or repetitive requests for correction. No does the OIG have to respond substantively to requests that concern information not covered by the guidelines or from a person whom the information does not affect.

## OIG RESPONSE TO THE REQUEST FOR CORRECTION

After the Counsel has made the final determination pertaining to a request for correction of information, a response will be sent by letter, e-mail, or fax. The response will explain the findings and the actions to be taken (if any) in response to the complaint.

The OIG will normally respond to requests for correction of information within 60 calendar days of receipt. If the request requires more than 60 calendar days to resolve, the OIG will inform the requestor that more time is required and indicate the reason why and an estimated decision date.

## REQUEST FOR RECONSIDERATION OF OIG'S DECISION

If the requestor disagrees with the OIG's denial of the request or with the corrective action the OIG intends to take, the requestor may file a request for reconsideration with the Inspector General (Reconsideration Official). Persons desiring to file a request for reconsideration should submit the request by letter, fax, or e-mail. Persons requesting reconsideration should also submit written material to support their case for reconsideration. They should not resubmit the information originally submitted to support the request for correction.

Requests for reconsideration must be filed with the OIG (postmarked or shipped by an overnight delivery service) within 35 calendar days of the date that the OIG transmitted its decision on the original request for correction. Requests for reconsideration that are received by the OIG after the 35-calendar day deadline will be denied as untimely.

## OIG REVIEW AND RESPONSE TO THE REQUEST FOR RECONSIDERATION

The Inspector General will review the information in question and the material submitted in support of the request for reconsideration, the material submitted with the original request for correction, and the OIG's response to that request. The Inspector General will then arrive at a decision regarding the request for reconsideration.

After the Inspector General has made a decision on the request for reconsideration, the OIG will respond to the requestor by letter, e-mail, or

fax. The response will explain the Inspector General's decision and the action the OIG will take (if any) in response to the request for reconsideration.

The OIG will respond to all requests for reconsideration within 45-calendar days of receipt.

## ANNUAL REPORT

Beginning on January 1, 2004, the OIG will submit a report to the Office of Management and Budget on the number and nature of complaints received by the OIG regarding its compliance with Sec. 515 of Public Law 106-554 and how these complaints were resolved.